

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NORTHEASTERN DIVISION

UNITED STATES OF AMERICA) **FILED UNDER SEAL**
)
v.)
) No. 2:19-CR-00013
GEORGIANNA A.M. GIAMPIETRO) JUDGE CRENSHAW
)

MOTION TO EXCUSE PRESENCE OF COUNSEL

The United States of America, by and through its attorney, the United States Attorney for the Middle District of Tennessee, respectfully requests that Assistant U.S. Attorney Ben Schrader be excused from the status conference scheduled today at 4:00 p.m. In support of that request, the government sets forth as follows:

On October 31, 2019, the Court directed all counsel of record to appear for a status conference in the above-referenced case at 4:00 p.m. on November 1, 2019. Since approximately 7:15 a.m. on October 31, 2019, however, undersigned government counsel and his wife have been at St. Thomas Midtown Hospital, where they welcomed their first child at approximately 8:34 p.m. on Halloween night. The family is currently recovering at the hospital and will not be discharged until Sunday, November 3, 2019. Undersigned government counsel will therefore be unable to attend the status conference today. Other counsel of record, however—namely, Assistant U.S. Attorney Phil Wehby—will be present for the government.

WHEREFORE, for good cause shown, the government respectfully requests that Assistant U.S. Attorney Ben Schrader be excused from appearing at the status conference today.

Respectfully submitted,

DONALD Q. COCHRAN
United States Attorney for the
Middle District of Tennessee

/s/ Ben Schrader
Ben Schrader
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was sent via e-mail transmission to counsel for the defendant this 1st day of November, 2019.

/s/ Ben Schrader
Ben Schrader
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